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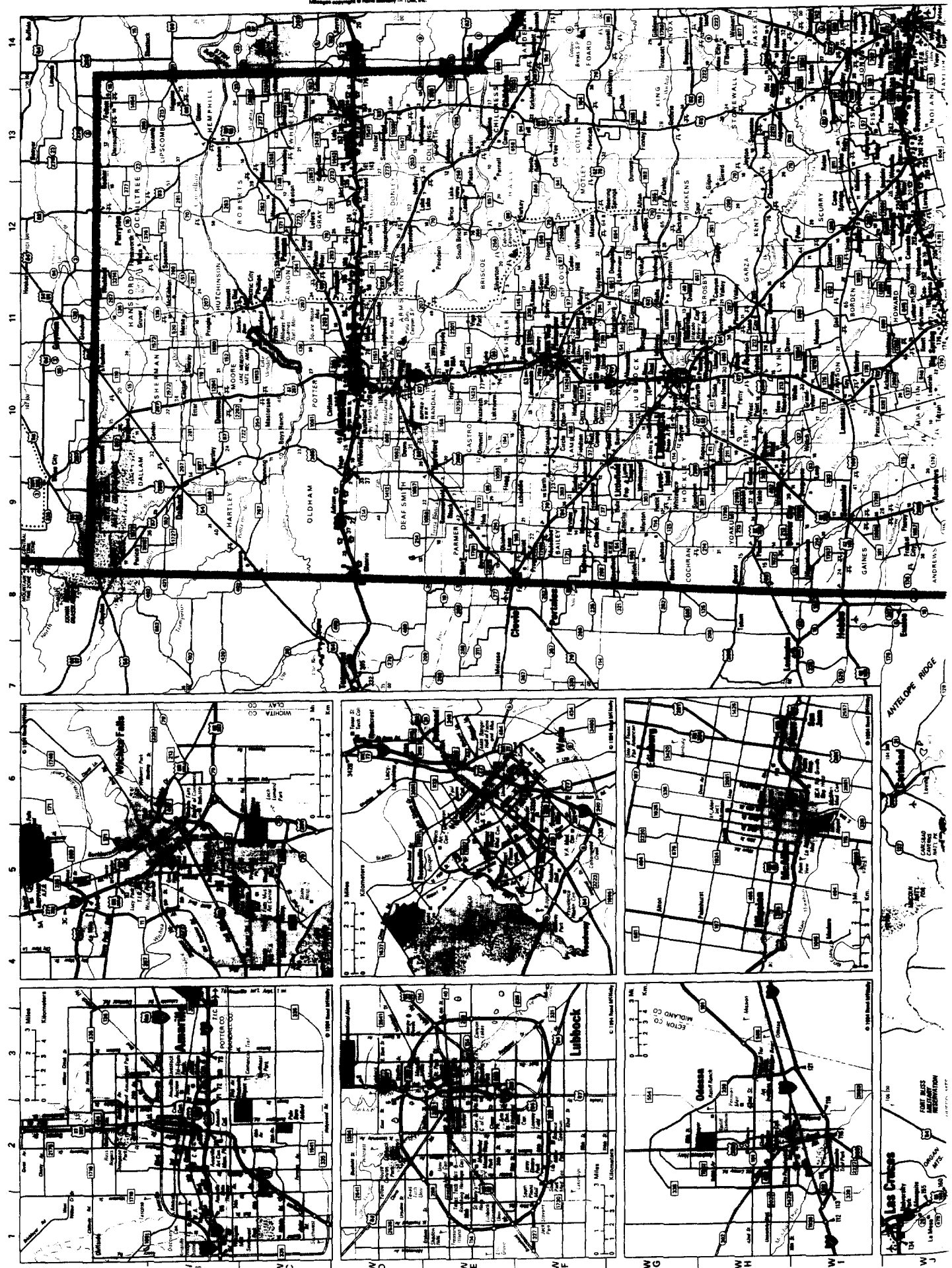


EXHIBIT D

DECLARATION OF THOMAS K. LANDRY

1. I am an attorney employed by the law firm of Wilmer, Cutler & Pickering.

2. On August 23, 1995, I called a telephone number listed for the Wolfforth Area Chamber of Commerce & Agriculture. The same number was listed for Wolfforth City Hall, and the person who answered identified herself as Ms. Donna Hudson at Wolfforth City Hall.

3. I asked Ms. Hudson whether there were any radio or television stations located in Wolfforth. She replied that there were not, and stated: "Being right here in Lubbock," there was "no need to have those things when we have them right here at our fingertips."

4. I then asked Ms. Hudson whether there were any publications or literature about Wolfforth of the kind that a chamber of commerce might typically have. She replied that there were not, and stated: "We're just not big enough for that."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 25, 1995.

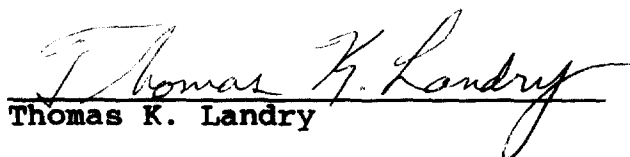

Thomas K. Landry

CERTIFICATE OF SERVICE

I, Thomas K. Landry, hereby certify that on this 25th day of August, 1995, I caused to be delivered by first-class mail, postage pre-paid, copies of the foregoing Reply Comments of Lee W. Shubert, Trustee, together with exhibits and the declaration of Thomas K. Landry, filed on this date, to the following:

James L. Primm
21st Century Radio Ventures, Inc.
713 Broadway
Santa Monica, CA 90401
(Petitioner)

Richard Zaragoza, Esq.
Kevin M. Walsh, Esq.
Fisher Wayland Cooper Leader
& Zaragoza, L.L.P.
2001 Pennsylvania Avenue, N.W. - Suite 400
Washington, D.C. 20006
(Attorneys for Emil Macha)


Thomas K. Landry